

PFE/RLW: May 2024
GJ #18

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA)
)
 v.)
)
 DAVID EDWARD COLLIER, II)

INDICTMENT

COUNT ONE: [18 U.S.C. §§ 2251(a) and (e)] – Sexual Exploitation of Children

The Grand Jury charges that:

Between on or about January 31, 2020, and August 31, 2022, a more specific date being unknown to the Grand Jury, in Lawrence County, within the Northern District of Alabama, the defendant,

DAVID EDWARD COLLIER, II,

did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, who had not attained 18 years of age, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, that is, an image known to the Grand Jury as **Exhibit 1**, knowing and having reason to know that such visual

depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO: [18 U.S.C. §§ 2251(a) and (e)] – Sexual Exploitation of Children

The Grand Jury charges that:

Between on or about January 31, 2020, and August 31, 2022, a more specific date being unknown to the Grand Jury, in Lawrence County, within the Northern District of Alabama, the defendant,

DAVID EDWARD COLLIER, II,

did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, who had not attained 18 years of age, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, that is, a video known to the Grand Jury as **Exhibit 2**, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign

commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE: [18 U.S.C. §§ 2251(a) and (e)] – Sexual Exploitation of Children

The Grand Jury charges that:

Between in or about January 2017, and January 2020, a more specific date being unknown to the Grand Jury, in Lawrence County, within the Northern District of Alabama, the defendant,

DAVID EDWARD COLLIER, II,

did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, who had not attained 18 years of age, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, that is, an image known to the Grand Jury as **Exhibit 3**, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and

the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR: [18 U.S.C. §§ 2251(a) and (e)] – Sexual Exploitation of Children

The Grand Jury charges that:

Between in or about January 2017, and January 2020, a more specific date being unknown to the Grand Jury, in Lawrence County, within the Northern District of Alabama, the defendant,

DAVID EDWARD COLLIER, II,

did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, who had not attained 18 years of age, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, that is, an image known to the Grand Jury as **Exhibit 4**, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of

interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FIVE: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about October 28, 2022, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT SIX: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about July 7, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign

commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT SEVEN: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about August 3, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT EIGHT: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about August 4, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign

commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT NINE: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about August 7, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT TEN: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about August 23, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign

commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT ELEVEN: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about August 25, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT TWELVE: [18 U.S.C. §§ 2252A(a)(1) and (b)(1)] – Transportation of Child Pornography

The Grand Jury charges that:

On or about February 15, 2023, in Lawrence County, within the Northern District of Alabama, and elsewhere, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did transport any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign

commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT THIRTEEN: [18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)] – Possession of Child Pornography

The Grand Jury charges that:

On or about August 28, 2023, in Lawrence County, within the Northern District of Alabama, the defendant,

DAVID EDWARD COLLIER, II,

knowingly attempted to and did possess and access with intent to view a computer, computer disk, and any other material that contains an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that involved a minor child who had not attained 12 years of age, that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce, and that was produced using materials that have been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

NOTICE OF FORFEITURE
[18 U.S.C. § 2253(a)]

As a result of the foregoing offenses alleged in COUNTS ONE and TWO of this Indictment, the defendant,

DAVID EDWARD COLLIER, II,

shall forfeit to the United States the following:

(a) any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, computer disk, thumb drive, flash drive, or other matter that contains any such visual depiction, which was produced, transported, mailed, shipped, and received in violation of Chapter 110 of the United States Code;

(b) any property, real or personal, used and intended to be used to commit and to promote the commission of such offenses, including but not limited to the following: Server (S/N 2204FD20190700952); HP Pavilion Laptop (S/N: 5CD3163VYQ); Microsoft Tablet Computer (S/N: 017338604551); Motorola Moto E5 Cruise (IMEI 351840098206562), and

(c) any proceeds or gross profits of the offenses, or any property traceable thereto; and any property, real or personal, used and intended to be used to commit and to promote the commission of the offense.

If any property subject to forfeiture pursuant to Title 18, United States Code, Section 2253(a), as a result of any act or omission of the defendant,

DAVID EDWARD COLLIER, II,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;

- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL

/s/ Electronic Signature

FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA
United States Attorney

/s/ Electronic Signature

R. LEANN WHITE
Assistant United States Attorney